

Kym Samuel Cushing, Esq.
Nevada Bar No. 4242
Douglas M. Rowan, Esq.
Nevada Bar No. 4736
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP
300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
(702) 727-1400; FAX (702) 727-1401
kym.cushing@wilsonelser.com
douglas.rowan@wilsonelser.com
Attorneys for Defendant TARGET CORPORATION

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GEORGE PHILLIPS, individually,

Plaintiff,

vs.

TARGET CORPORATION f/n/a DAYTON
HUDSON CORPORATION d/b/a TARGET
STORE T826; JOHN DOE and/or JANE DOE;
DOES I through X and ROE CORPORATIONS I
through X, inclusive,

Defendants

CASE NO.: 2:14-cv-00468-JCM-CHM

STIPULATION AND ORDER FOR DISMISSAL OF ENTIRE CASE WITH PREJUDICE

Plaintiff GEORGE PHILLIPS ("Plaintiff"), by and through his counsel of record FARHAN R. NAQVI, ESQ., of NAQVI INJURY LAW, and Defendant TARGET CORPORATION ("Defendant"), by and through its counsel of record, KYM SAMUEL CUSHING, ESQ., of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, hereby stipulate and agree to the following:

1. Defendant hereby withdraws its Bill of Costs [Doc. #34] and Notice of Corrected Image/Document re: 34 Bill of Costs by Defendant Target Corporation [Doc. #35] and will not otherwise pursue costs against Plaintiff.
2. In consideration of Defendant's agreement not to pursue costs against Plaintiff as set forth herein, Plaintiff agrees to waive any rights to appeal the Order [Doc. #32] granting

Defendant's Motion for Summary Judgment [Doc. #29] or the associated Judgment in a Civil Case [Doc. #33].

3. Plaintiff hereby withdraws Plaintiff's Motion to Extend Time to File Notice of Appeal Pursuant to F.R.A.P. 4(a)(5) [Doc. #37] as moot.
4. This action shall be dismissed in its entirety, with prejudice, each party to bear their own fees and costs.

DATED this 15th day of September, 2015.

DATED this 10th day of September, 2015.

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

NAQVI INJURY LAWYERS

BY: [Signature]
Kym Samuel Cushing, Esq.
Nevada Bar No. 004242
Douglas M. Rowan, Esq.
Nevada Bar No. 004736
300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
Attorneys for Defendant
TARGET CORPORATION

BY: /s/ Elizabeth Coleman
Farhan R. Naqvi, Esq.
Nevada Bar No. 008589
Elizabeth E. Coleman, Esq.
Nevada Bar No. 012350
9500 W. Flamingo Road, Suite 104
Las Vegas, NV 89147
Attorney for Plaintiff GEORGE PHILLIPS

ORDER

IT IS SO ORDERED.

DATED September 15, 2015.

[Signature]
U.S. DISTRICT COURT JUDGE

Prepared and Respectfully Submitted by:

**WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER LLP**

BY: [Signature]
Kym Samuel Cushing, Esq.
Nevada Bar No. 004242
Douglas M. Rowan, Esq.
Nevada Bar No. 004736
300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
Attorneys for Defendant Target Corporation